

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CRIMINAL ACTION NOS. 04-30032-MAP
005 JUL 30 A 11043 0032-MAP-1

UNITED STATES OF AMERICA,
Plaintiff

vs.

FRANCIS G. KEOUGH, III
Defendant

U.S. DISTRICT COURT
DISTRICT OF MASS.

DEFENDANT'S MOTION TO TRANSFER ASSETS TO OBTAIN COUNSEL

NOW HERE COMES the Defendant, Francis G. Keough, III, and respectfully requests this Honorable Court to allow his wife, Sharon Keough, to sell or refinance the property owned by Sharon Keough at 153-155 Pomona Street, Springfield, Massachusetts.

This Court's Amended Order Setting Conditions of Release for the Defendant on July 29, 2005, and signed by the Defendant and his wife, restricted the Defendant's wife, Sharon Keough, by stating "Sharon Keough, shall not further encumber or transfer any of the properties referred to in court that are in her name, without prior approval of the court..."

On November 30, 2005, the Defendant, Francis G. Keough, III, filed a motion to have this Court appoint counsel. On December 2, 2005, that motion was denied. As such, the Defendant now needs to transfer assets to obtain private counsel.

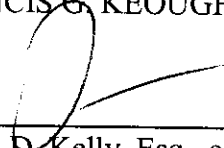
Defendant states that, if allowed financial access to the Pomona Street property, Sharon Keough will apply to refinance the property and withdraw equity for the purposes of retaining counsel. If that application is denied, the Defendant and his wife propose to sell that property. Proceeds of the sale would then be used to retain counsel.

The Defendant has contacted undersigned counsel, and wishes to retain undersigned counsel for the purposes of defending him in these, and all matters before this Court. The Defendant does not have sufficient liquid assets to obtain counsel, but rather, would need financial access to the Pomona Street property.

Undersigned counsel would further request that filing this motion not be considered an appearance on this case. Rather, the undersigned counsel requests his appearance, at this point, be for the limited purposes of allowing Sharon Keough to access Pomona Street.

Should the Court grant this motion, undersigned counsel will file an appearance on this matter.

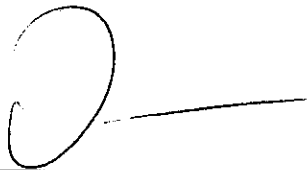
THE DEFENDANT
FRANCIS G. KEOUGH, III

By 
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CERTIFICATE OF SERVICE

I, Daniel D. Kelly, Esq., hereby certify that on this 30th day of December, 2005, I served a copy of the above upon the parties in the action hand delivery to William M. Welch, II, Assistant United States Attorney, Federal Building and Courthouse, 1550 Main Street – Room 310, Springfield, MA 01103.

Subscribed under the penalties of perjury.


Daniel D. Kelly, Esq.